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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HIRAM JOHNSON,

Case No. 3:21-cv-00441-LRH-CLB

Plaintiff,

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR FILING
OF THE CASE MANAGEMENT REPORT**

v.

(First Request)

DAL GLOBAL SERVICES, LLC,
aka DELTA GLOBAL SERVICES,

Defendant.

_____/

Pursuant to LR 7-1, Plaintiff, by and through his counsel of record, Terri Keyser-Cooper, of the Law Office of Terri Keyser-Cooper, and Defendant, by and through its counsel of record, Ethan D. Thomas, of Littler Mendelson P.C., hereby stipulate and request that this Court extend the deadline for filing the Case Management Report presently due on January 4, 2022 by thirty (30) days, up to and including February 4, 2022. In support of this stipulation and request, the parties state as follows:

Plaintiff's counsel is going out of the country on December 1 and returning on December 13, 2021. On December 28, 2021, Plaintiff's counsel is also having surgery. Ms. Keyser-Cooper's doctors have informed her she will require, at minimum, ten days of recovery after the surgery during which time she should not be sitting at her desk or in front of a computer. Also, the parties have been

1 informed that an Early Neutral Evaluation (“ENE”) will be set for some time in the near future. If the
2 case were to resolve at the ENE it would necessarily obviate the need for a Case Management
3 Conference or Report.

4 This request for an extension of time is not sought for any improper purpose or for purposes of
5 unnecessary delay.
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7 WHEREFORE, the parties respectfully request that this Court extend the date for the filing of
8 the Case Management Report up to and including February 4, 2022.

9 IT IS SO STIPULATED this 23 day of November, 2021.

10 LITTLER MENDELSON P.C.

TERRI KEYSER-COOPER

11 By /s/ Ethan D. Thomas
12 Ethan D. Thomas
13 3660 Howard Hughes Parkway, Suite 300
14 Las Vegas, Nevada 89169
15 Attorney for Defendant

By /s/ Terri Keyser-Cooper
Terri Keyser-Cooper
2395 Viejo Place
Lake Havasu City, AZ
86406
Attorney for Plaintiff

17 **ORDER**

18 IT IS SO ORDERED this 23rd day of November, 2021.

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23 United States Magistrate Judge
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